

UNITED STATES DISTRICT COURT

for the

Northern District of Ohio

Division

FILED

2017 JAN -9 AM 11:39

CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
AKRON

Case No. 5:17 CV 57

(to be filled in by the Clerk's Office)

JUDGE LIOI

Jury Trial: (check one) ☒ Yes ☐ No

MAG. JUDGE BURKE

Robert Ginsbach

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

See Attached

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Robert Ginsbach		
Address	6310 East Picadilly Road		
	Muncie	Indiana	47303
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Delaware		
Telephone Number	765-282-2495		
E-Mail Address	n/a		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	Rachell Bullock		
Job or Title <i>(if known)</i>			
Address	1922 Brightwood Road SE		
	New Philadelphia	Ohio	44663
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Tuscarawas		
Telephone Number	330-605-4715		
E-Mail Address <i>(if known)</i>			

☒ Individual capacity ☐ Official capacity

Defendant No. 2

Name	Tara Wright-Timberlake		
Job or Title <i>(if known)</i>	Asst. Law Director and Counsel for Rachell Bullcok		
Address	122 South Wooster Ave.		
	Strasburg	Ohio	44680
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Tuscarawas		
Telephone Number	330-878-5535		

E-Mail Address (if known)

☒ Individual capacity ☒ Official capacity

Defendant No. 3

Name

Dovovan Hill

Job or Title (if known)

(GAL)

Address

116 Cleveland Ave. Suite 808

Canton

Ohio

44702

City

State

Zip Code

County

Stark

Telephone Number

330-437-0101

E-Mail Address (if known)

☒ Individual capacity ☒ Official capacity

Defendant No. 4

Name

Barbara Schwartz

Job or Title (if known)

Clinial Social Worker for Chrysalis Counseling Center

Address

1029 West High Ave.

New Philadelphia

Ohio

44663

City

State

Zip Code

County

Tuscarawas

Telephone Number

330364-9360

E-Mail Address (if known)

☒ Individual capacity ☒ Official capacity**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Invasion of Privacy, (42 U.S. Code 1320d) fair and unbiased court hearings, lack of Jurisdiction under (Ohio Juv. R 11) (UCCJEA) Jurisdiction for Uniform Child Custody Jurisdiction Enforcement Act, under the Ohio revised Code 3127.18(c) under the Ohio rules of Judicial conduct Rule 2.11 Disqualification, (A) A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned, including but not limited to the following circumstances: (1) The judge has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding...

- C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Tara Wright-Timberlake, has caused emotional stress, mental anguish, loss of consortium, breakdown of the family relationship regarding father and son, and between siblings, denied access to and companionship with his son Graysen Ginsbach, interfering with custody, Fraud, failing to filing criminal charges against Rachell Bullock due to the fact Ms. Wright-Timberlake works for the New Philadelphia (Tuscarawas County Ohio) Ohio Law Director Office, (Deprivation of the Plaintiff Rights Under Color of Law ((Title 18, U.S.C., Section 242)) by using her professional position, failing to comply with (UCCJEA) Jurisdiction for Uniform Child Custody Jurisdiction Enforcement Act, using her professional position as Asst. Law Director to have criminal charges filed against plaintiff in order to block the plaintiff to attend court hearing. Ex parte communication with the courts Donovan Hill, did knowingly and intentional caused Intentional Infliction of Emotional Distress, Invasion of Privacy, (42 U.S. Code 1320d) by gaining records under false pretense, to bring harm to the plaintiff and his son. Ex parte communication with the courts.

Linda Kate and Joy Reed, knowingly and allowing criminal charges not to be filed against the defendant Rachell Bullock for taking a minor child against the wishes of the plaintiff's across state lines (Indiana to Ohio) knowingly and intentional caused Intentional Infliction of Emotional Distress, Invasion of Privacy, allowing (GAL) Donovan Hill to violate the plaintiff (HIPAA) right under 42 U.S. Code 1320d by gaining records under false pretense, allowing Court records to Trease Brown in order for her to bring harm to the plaintiff and his son. Deprivation of the Plaintiff Rights Under Color of Law (Title 18, U.S.C., Section 242) Fraud upon the Court (Title 28 Section 455a) and Violation of the plaintiff Constitutional Rights under (Title 42 Section 1983) this includes the rights under the fourteenth Amendment which guarantees the right of the individual... to establish a home and bring up their children, to worship God per his conscience without the interference of the courts or government, lack of Jurisdiction under (Ohio Juv. R 11) (UCCJEA) Jurisdiction for Uniform Child Custody Jurisdiction Enforcement Act, under the Ohio revised Code 3127.18(c) there is no Provision that states that an Aunt or Grandparents who unlike a parent does not have fundamental rights in care and custody

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

Tuscarawas County Ohio, Stark County Ohio, Muncie Indiana,

B. What date and approximate time did the events giving rise to your claim(s) occur?

May, 1 2013 - December 31 2016

C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

Rachell Bullock: has caused emotional stress, mental anguish, loss of consortium, breakdown of the family relationship regarding father and son, and between siblings, denied access to and companionship with his son Graysen Ginsbach, Interfering with custody, Fraud, kidnapping,

Tara Wright-Timberlake, has caused emotional stress, mental anguish, loss of consortium, breakdown of the family relationship regarding father and son, and between siblings, denied access to and companionship with his son Graysen Ginsbach, interfering with custody, Fraud, failing to filing criminal charges against Rachell Bullock due to the fact Ms. Wright-Timberlake works for the New Philadelphia (Tuscarawas County Ohio) Ohio Law Director Office, (Deprivation of the Plaintiff Rights Under Color of Law ((Title 18, U.S.C., Section 242)) by using her professional position, failing to comply with (UCCJEA) Jurisdiction for Uniform Child Custody Jurisdiction Enforcement Act, using her professional position as Asst. Law Director to have criminal charges filed against plaintiff in order to block the plaintiff to attend court hearing. Ex parte communication with the courts.

Donovan Hill, did knowingly and intentional caused Intentional Infliction of Emotional Distress, Invasion of Privacy, (42 U.S. Code 1320d) by gaining records under false pretense, to bring harm to the plaintiff and his son. Ex parte communication with the courts.

) Linda Kate and Joy Reed did knowingly and intentional caused Intentional Infliction of Emotional Distress, Invasion of Privacy, to bring harm to the plaintiff and his son. Deprivation of the Plaintiff Rights Under Color of Law (Title 18, U.S.C., Section 242) Fraud upon the Court (Title 28 Section 455a) and Violation of the plaintiff Constitutional Rights under (Title 42 Section 1983) this includes the rights under the fourteenth Amendment which guarantees the right of the individual... to establish a home and bring up their children, to worship God per his conscience without the interference of the courts or government, lack of Jurisdiction under (Ohio Juv. R 11) (UCCJEA) Jurisdiction for Uniform Child Custody Jurisdiction Enforcement Act, under the Ohio revised Code 3127.18(c) there is no Provision that states that an Aunt or Grandparents who unlike a parent does not have fundamental rights in care and custody. failing to protecting the plaintiff minor child privacy by allowing the clerk to release records to Teresa Brown, (audio recordings, documents)

Barbara Schwartz, did knowingly and intentional caused Intentional Infliction of Emotional Distress, Invasion of Privacy, (42 U.S. Code 1320d) by release, and gain records under false pretense, to bring harm to the plaintiff and his son. Ex parte communication with the courts. medical Malpractice (Indiana & Ohio) (Indiana Medical Malpractice Act) (Breach of privacy rights under the Health Insurance portability and Accountability Act).

Chrysalis Counseling Center Inc. failed in it professional duty to protect the privacy and confidentiality of the plaintiff's health records, Chrysalis Counseling Center Inc failed to take "take appropriate steps" after it learned that is staff member did intentional released personal records to a 3rd party (Donovan Hill, Teresa Brown, and Lisa Riggs) and failing to act against the employy for fialing to follow its own company rules for such breach.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

emotional stress, mental anguish, loss of consortium, breakdown of the family relationship regarding father and son, and between siblings, denied access to and companionship with his son Graysen Ginsbach weekly counseling lost of weight,

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Rachell Bullock, return of minor Child Graysen Ginsbach, with no visitation excluding Wade and Arlene Fry which will have visitation once a month in the State of Indiana, and damages in the sum of \$500,000.00 US dollars.

Defendant: Tara Wright-Timberlake to be terminated from the New Philadelphia (Tuscarawas County Ohio) Ohio Law Director Office, 2500 pro bono work for single fathers who have minor children (custody, support,) and damages of \$5,000,000.00 US dollars.

Defendant: Donovan Hill, 3000 hours of pro bono work for single father, who have minor children and damages in the sum of \$5,000,000.00 US. dollars

Defendant(s) Lind Kate, and Joy Reed be terminated from Tuscarawas County, 5000 hours each of pro bono work for single fathers (Custody, support) and damages of \$10,000,000.00 or \$5,000,000.00 each.

Defendant(s) Barbara Schwartz, and Chrysalis Counseling Center Inc, Barbara Schwartz to be terminated and barred from doing any type of counseling for 5 years and damages of \$10,000,000.00 or \$5,000,000.00 each.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: January 5 2017

Signature of Plaintiff

Printed Name of Plaintiff

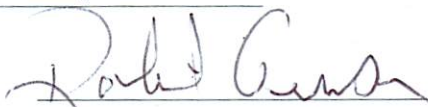

Robert Ginsbach

B. For Attorneys

Date of signing: January 5 2017

Signature of Attorney

Printed Name of Attorney


Robert Ginsbach pro-se

Bar Number

Name of Law Firm

Address

6310 East Picadilly Road

Muncie

City

Indiana

State

47304

Zip Code

Telephone Number

765-282-2495

E-mail Address